

OMB Clearance Justification
for
MyPyramid Tracker Information Collection for
Registration, Login, and
Food Intake and Physical Activity Assessment Information

March 21, 2005

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A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

a. Delegated Authority and Mission of the Center for Nutrition Policy and Promotion

The Center for Nutrition Policy and Promotion (CNPP) of the U.S. Department of Agriculture (USDA) has the mission to improve the nutritional status of Americans by developing and promoting science-based dietary guidance and economic information for the public. CNPP is involved with the development and promotion of the *Dietary Guidelines for Americans* and *MyPyramid*. CNPP has among its major functions the development and coordination of nutrition policy within USDA and the investigation of techniques for effective nutrition communication. Under Subtitle D of the National Agriculture Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3171-3175), the Secretary of Agriculture is required to develop and implement a national food and human nutrition research and extension program, including the development of techniques to assist consumers in selecting food that supplies a nutritionally adequate diet. Pursuant to 7 CFR 2.19(a)(3), the Secretary of Agriculture has delegated authority to CNPP for, among other things, developing materials to aid the public in selecting food for good nutrition; coordinating nutrition education promotion and professional education projects with the Department; and consulting with the Federal and State agencies, the Congress, universities, and other public and private organizations and the general public regarding food consumption and dietary adequacy. The authority delegated to CNPP is presented in Appendix A.

b. Justification for Data Collection

The Center for Nutrition Policy and Promotion (CNPP) of the U.S. Department of Agriculture (USDA) wants to provide MyPyramid Tracker users with personalized nutrition and physical activity assessment based on most up-to-date guidance, which can only be accessed by the individual user him/herself. The user information can be accessed by using a unique ID and password which is created by the user. User dietary and physical activity information is entered in the system and stored in order to provide feedback to the user. Diet and physical activity histories will be stored on the server to be called up by the user for future reviews. Formative research testing for future Tracker enhancements will be performed to evaluate web site usability prior to its release to the public.

2. Indicate how, by whom and for what purpose the information is to be used.

The information obtained from users will be stored in a user information database, which is owned and maintained by FNS IT staff. Only the database system engineer will have access to users' information during the system maintenance when it is necessary. Neither CNPP nor FNS staff will have access to any user ID and password information nor dietary or physical activity information.

CNPP/FNS do not plan in any way to use the data acquired, stored or generated by the user. CNPP may, however, use aggregated zip code data in the future to make system improvements.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.**

All data collection will occur electronically. The electronic transmission automatically stores user's self-created user ID and password as well as food consumption, physical activity and analyzed assessment results.

- 4. Describe efforts to identify duplication.**

There is no duplication involved in this process of collecting data. Each user will create his/her own user IDs and passwords.

- 5. Impact on small businesses or other small entities.**

No data are being collected from small businesses or other small entities. To our knowledge, there will be no impact on small businesses or other small entities.

- 6. Describe the consequences to Federal program of policy activities if the collection is not conducted or is collected less frequently.**

If the information is not collected, users will not be able to access their personal information and cannot evaluate their food intake and physical activity status. The frequency of data collection is based on users' personal will. Inability to collect this information will result in a decrease in effort for contributing to the goal of achieving the President's *HealthierUS* Initiative.

- 7. Explain any circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.6.**

Information collected from the Website user (such as weight and height) is necessary to provide accurate nutrition and physical activity recommendations for the user. This information can be entered as often as daily based on the users own discretion. CNPP/FNS will not be able to access this information.

8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency notice.

The 60-day notice for the “MyPyramid Tracker Information Collection for Registration, Login, and Food Intake and Physical Activity Assessment Information” was published on Friday, December 2, 2005 on page 72283-72284 of the Federal Register, Vol 70, No. 231. A copy of the Federal Register notice is presented in Appendix B.

a. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data and frequency of collection.

The Federal Register Notice was published and was available for comment to the public for a period of 60 days. No comments were received.

b. Consultation with representatives of those from whom information is to be obtained.

The collection of information only applies to users who are willing to evaluate their dietary and physical activity status, thus no consultation is necessary.

9. Explain any decision to provide any payment of gift to respondents.

No payment or gift to respondents is being provided.

10. Describe any assurance of confidentiality provided to respondents.

The home page of the web site that describes its purpose and provides contact information also contains a statement that “All user information will be kept confidential. No individual’s name or response will be identified.” (Appendix C)

11. Provide additional justification for any questions of a sensitive nature.

This information collection does not involve questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

The total number of respondents for this collection is expected to be 900,000 for one time registration, login, and food intake and physical activity information. An estimated of 8,700 respondents will track their food intake and physical activity information for one year. The formative evaluation will include an estimated 300 college students who will log-in, enter and track 3 days worth of food intake and physical activity information. Each respondent will spend 1 minute to register, 0.5 minute for login process, and 30 minutes to enter food and physical activity information in the system. The total estimation of the burden hour is 2,082,905 hours. These hours were based on the following:

Number of Respondents:

General public: 900,000 respondents*

Formative evaluation: 300 respondents

Estimated Time Per Response:

Registration 1 minute

Login	0.5 minute
Food and physical activity	30 minutes
Frequency of response:	once
Total Annual Responses:	9,036,300

*The number of respondents has been established through MyPyramid Tracker activity which was evaluated over a 4 month period from September to December 2005. It was estimated that there were 75,000 (average per month) new account registrants and 72,349 active users (average per month) that entered food and physical activity data for a period of at least one day. From the active users it is estimated that approximately 1% will continue to use the Tracker on a daily basis for up to one year. This would equate to approximately 725 repeat users each month who would visit the site on a daily basis for up to 1 year.

b. Provide estimates of annualized cost to respondents for the hour burden for collections of information.

An estimate of annual cost to respondents for the burden hour for collections of information is \$ 37,679,751.50 (2,082,905 hours x \$18.09). This estimate is based on an average hourly earning wage of \$18.09 (\$18.09 hourly rate is derived from the U.S. Department of Labor, Bureau of Labor Statistics August 2005 Report – National Compensation Survey: Occupational Wages in the United States, July 2004. See <http://www.bls.gov/ncs/ocs/sp/ncbl0727.pdf>).

13. Provide an estimate of the total annual cost burden to respondent of record keepers resulting from the collection of information.

There is no capital/startup or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government.

The estimated annualized cost to the Federal government is approximately \$76,500. This estimate is based on the following:

Annual server hosting cost:	\$20,000
Annual server enhancement and maintenance:	\$24,000
One Federal employee (GS13-1, \$31.25/hour) .5 FTE:	\$32,500

Subtotal: \$76,500

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new information collection; therefore the 2,082,905 burden hours now constitute a program change.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

The information collected from the user will not be used for any research purposes, only the aggregated zip code information will be used by CNPP internal staff for making future web site improvements.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be appropriate.**

CNPP is not seeking exemption from this requirement. Please see Appendix D—OMB Burden Statement as it appears on the MyPyramid Tracker Home Page.

- 18. Explain each exception to the certification statement identified in Item 19.**

There are no exceptions to the certification statement being requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The user information collected will not be analyzed in any way.